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12 UNITED STATES DISTRICT COURT
13 NORTHERN DISTRICT OF CALIFORNIA
14 SAN FRANCISCO DIVISION

15) MDL NO. 06-1791 VRW

16)
17 IN RE:)

18 NATIONAL SECURITY AGENCY)
19 TELECOMMUNICATIONS)
RECORDS LITIGATION)

**REPLY IN SUPPORT OF VERIZON'S
ADMINISTRATIVE MOTION TO
EXCEED OTHERWISE APPLICABLE
PAGE LIMITS IN ITS MOTION TO
DISMISS PLAINTIFFS' MASTER
CONSOLIDATED COMPLAINT**

20 This Document Relates To:)

[Civ. L.R. 7-11]

21 ALL CASES)
22)
23)
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28)

1 In their response to Verizon's motion for leave to file a 95-page brief in support of its motion
2 to dismiss the Master Consolidated Complaint, Plaintiffs ask the Court to limit Verizon to 40 pages,
3 even though counsel for the Verizon Plaintiffs had previously consented to a 75-page brief. *See*
4 Decl. of John A. Rogovin ¶ 3. While Verizon believes that 75 pages are not enough to set forth its
5 constitutional and statutory arguments fully, the 40-page limit Plaintiffs now suggest is clearly
6 insufficient to explain why Plaintiffs' ten claims fail as a matter of law.

7 Verizon does not object to Plaintiffs' request that they be granted leave to file a brief of equal
8 length.^{1/}

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10 Dated: March 22, 2007

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18 By: /s/ John A. Rogovin

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20 _____
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23 Maryland Inc., MCI Communications Services,
24 Inc., Cellco Partnership, and Verizon Wireless
25 (VAW) LLC

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27 ^{1/} Civil Local Rule 7-11 does not directly address the filing of reply briefs in support of an
28 administrative motion. To the extent leave of the Court is required in order to file such a reply brief,
Verizon hereby respectfully seeks leave to do so.